

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

CASE NO.

1:11CR 50-1

v.

ANDREW F. KEITH

INDICTMENT

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2252(b)(2)

18 U.S.C. § 2253(a)(1)

18 U.S.C. § 2253(a)(3)

BECKWITH

The Grand Jury charges that:

Count 1

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00322 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 2

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00323 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 3

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00325 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 4

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00377 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 5

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00378 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 6

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00497 and which depicts KEITH partially nude lying on a bed beside a prepubescent male while KEITH is touching the male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 7

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been

mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00778 and which depicts KEITH fondeling the penis of a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 8

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00781 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 9

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00794 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 10

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00843 and which depicts a prepubescent male lying on his back with his knees to his chest while KEITH is penetrating his anus with his toe.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 11

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00857 and which depicts KEITH fondeling the penis of a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 12

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00870 and which depicts KEITH performing oral sex on a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 13

On or about January 13, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00911 and which depicts KEITH fondeling the penis of a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 14

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 01080 and which depicts KEITH fondeling the penis of a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 15

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified

as 01095 and which depicts KEITH fondeling the penis of a prepubescent male.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 16

On or about June 10, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00076 and 00077 and depicting the anal and genital area of a prepubescent male with KEITH exposing the anal area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 17

On or about June 21, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00087, 00088, 00090, among others, and which depict a nude prepubescent male lying on his back with his legs spread.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 18

On or about June 21, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00094, 00095 and 00096 and which depicts a nude prepubescent male lying on his back with his genitals exposed with KEITH fondeling the child's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 19

On or about June 21, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00097, 00098 and 00099, among others, and which depict a nude prepubescent male standing while exposing his genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 20

On or about June 21, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00102, 00103

and 00104 and which depict a nude prepubescent male bent over with his head between his legs exposing his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 21

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00109 and 00110 and which depict a nude prepubescent male lying on his back with his legs spread exposing his genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 22

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00111 and which depicts a nude prepubescent male lying on his stomach exposing his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 23

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00112, 00113, and 00118, among others, and which depict close up images of a nude prepubescent male's genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 24

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00119, 00120 and 00123, among others, and which depict close up images of a nude prepubescent male's anus with an adult males hands spreading his buttocks.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 25

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00124 and 00125 and which depict a partially nude prepubescent male exposing his genital area while lying on

his back.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 26

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00126, 00127 and 00130, among others, and which depict a partially nude prepubescent male touching his penis while lying on his back.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 27

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00131 and which depicts a partially nude prepubescent male lying on his back with his legs spread exposing his genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 28

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00132, 00133 and 00136, among others, and which depict close up images of a nude prepubescent male's genital area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 29

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00146 and which depicts a nude prepubescent male lying on his back with his genitals exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 30

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00147, 00148, 00150 and which depict a partially nude prepubescent male lying on his back with his legs spread

exposing his genitals and shorts around his ankles.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 31

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00151, 00152 and 00156, among others, and which depict a partially nude prepubescent male lying on his back with his knees pulled toward his shoulders exposing his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 32

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00157, 00158 and 00159, and depicting an image of a mostly nude pre-pubescent boy lying on a bed with his hips pushed up towards the camera. His penis is erect.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 33

On or about June 23, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00160, 00161 and 00171, among others, and depicting an image of a mostly nude pre-pubescent boy lying on a bed with his red shirt tucked under his arms. His penis is erect.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 34

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00179 and depicting an image of a partially nude pre-pubescent boy lying on a bed with his legs spread and his erect penis exposed..

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 35

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00180, and

depicting an image of a partially nude boy lying on a bed with his legs up over his head, exposing his anus and genital area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 36

On or about June 24 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00181 and 00183, and depicting an image of a partially nude boy lying on a bed with his legs spread, exposing his erect penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 37

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00184 and 00185 and depicting an image of a partially nude pre-pubescent boy lying face down on a bed, his butt is raised in the air, exposing his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 38

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00187, and depicting an image of a partially nude pre-pubescent boy that is lying on a bed with his legs up by his ears, exposing his anus and genitals. He is using his hands to further expose his anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 39

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00188 and 00189, and depicting a close up image of a pre-pubescent boy's anus and genitals. He is using his hands to further expose his anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 40

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was

transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00190, 00191, and 00192, and depicting a close up image of a pre-pubescent boy's anus and genitals. He is using his hands to further expose his anus. There appears to be semen around his anal opening and on his buttocks.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 41

On or about June 24, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00195, and depicting an image of a partially nude pre-pubescent boy's body sitting on the bed getting dressed. His penis is exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 42

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00201, 00202, 00203, and depicting a close-up image of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 43

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00204, and depicting an image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 44

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00205, and depicting an image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 45

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped,

and transported in interstate or foreign commerce: to wit, a photo partially identified as 00206, and depicting an image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 46

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00207, and depicting an image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 47

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00208, and depicting a close-up image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 48

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit

conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00209, 00210 and 00211, and depicting a close-up image of a pre-pubescent boy fondling himself.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 49

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00212, and depicting an image of a nude pre-pubescent boy's torso lying on a bed with his penis exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 50

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00213, 00214, 00215, and 00216 and depicting a side image of a pre-pubescent boy's anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 51

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00217 and 00218, and depicting an image of a partially nude pre-pubescent boy lying on a bed with his knees underneath him and his anus and genitals up in the air.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 52

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00219, 00220, and 00221, and depicting an image of a partially nude pre-pubescent boy lying on a bed fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 53

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was

transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00222, 00223, 00224, and 00225, and depicting an image of a partially nude pre-pubescent boy lying on his side on a bed, exposing his erect penis. He is making a hand sign to the camera.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 54

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00226, 00227, 00230, and depicting an image of a partially nude pre-pubescent boy standing in front of a blue wall. He is holding up his shirt to further expose his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 55

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00233 and 00234, and depicting a close-up image of a pre-pubescent boy's anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 56

On or about June 25 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00235 and 00236, and depicting an image of a partially nude pre-pubescent boy lying on a bed with his knees tucked under him, pushing his penis towards the camera.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 57

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00237, and depicting an image taken from the side of a partially nude pre-pubescent boy lying on a bed with his knees tucked under his, pushing his penis towards the camera. His arms are under his back.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 58

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was

transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00238 and 00239, and depicting an image of a partially nude pre-pubescent boy lying on a bed with his knees tucked under him, fondling his penis. His arms are under his back.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 59

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00240, 00241, 00242, and 00243, and depicting an image of a pre-pubescent boy's anus and genital area. The boy is digitally penetrating his anus and holding his penis with his other hand.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 60

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00244 and 00245, and depicting an image of a partially nude pre-pubescent lying on a bed with his legs in the air, exposing his anus and genital area. He is digitally penetrating his anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 61

On or about June 25, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00246, and depicting a close-up image of a pre-pubescent boy's erect penis with the defendant's thumb fondling it.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 62

On or about June 27, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00247, 00248, 00249 and 00256, and depicting an image of a nude pre-pubescent boy standing in front of a white sheet with his penis exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 63

On or about June 27, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit

conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00257 and 00258 and depicting an image of a partially nude pre-pubescent boy standing in front of a sheet pulling his underwear down with one hand and holding his penis with the other.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 64

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00260 and 00261, and depicting an image of a nude pre-pubescent boy standing in front of a sheet with his penis exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 65

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00263 and 00264, and depicting an image of a nude pre-pubescent boy sitting on the edge of a bed with his

knees spread apart, exposing his penis. The boy is fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 66

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00265, 00269, and 00270, and depicting an image of a nude pre-pubescent boy sitting on the edge of a bed with his knees spread apart, exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 67

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00271, 00272, 00276, and 00277, and depicting an image of a nude pre-pubescent boy lying on the bed with his hands behind his head. His knees are spread to the side exposing his genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 68

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F.

KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00274, 00275, 0000284, among others, and depicting a close-up image of a nude pre-pubescent boy lying on the bed with his knees spread to the side, exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 69

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00285, and depicting a close-up image of a pre-pubescent boy's anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 70

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00286, and depicting a close up of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 71

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00290, and depicting an image of a pre-pubescent boy lying nude on a bed, fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 72

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00291, and depicting an image of a pre-pubescent boy lying on a bed, his penis is erect.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 73

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped,

and transported in interstate or foreign commerce: to wit, a photo partially identified as 00292, and depicting an image of a nude pre-pubescent boy lying on a bed with his legs up by his ears. He is holding his buttocks, further exposing his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 74

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00293, 00294, 00295, 00296, and depicting an image of a nude pre-pubescent boy lying on a bed with his legs by his ears. The camera is focused on his anus and genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 75

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00298 and 00299, and depicting a close-up image of a pre-pubescent boy's penis, which is protruding through his underwear and being fondled by the boy.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 76

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00301, 00303, 00303, and 00304, and depicting an image of a pre-pubescent boy sitting low on a chair. He is holding up his shirt with his shorts pulled down around his knees, exposing his erect penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 77

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00305, and depicting an image of a pre-pubescent boy's anus and penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 78

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped,

and transported in interstate or foreign commerce: to wit, photos partially identified as 00306, 00307, and 00308, and depicting a very close-up image of a pre-pubescent boy's anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 79

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00309, and depicting an image of a standing pre-pubescent boy's penis. He is only wearing a t-shirt.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 80

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00311, 00312, 00315, among others, and depicting a very close-up image of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 81

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit

conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00316, 00317, 00318, and depicting an image of a partially nude pre-pubescent boy standing. His penis is erect and his shirt is pulled away from his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 82

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00319, 00320, 00326, among others, and depicting a very close-up image of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 83

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00327, and depicting a close-up image of a pre-pubescent boy's anus and part of his genitals.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 84

On or about June 28 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00328, 00329, and 00331, and depicting an image of a partially nude pre-pubescent boy lying on his back with his knees tucked up, exposing his anus and genital area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 85

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00332 and 00333, and depicting a very close-up image of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 86

On or about June 28, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped,

and transported in interstate or foreign commerce: to wit, photos partially identified as 00335, 00336, 00337, and depicting a very close-up image of an erect, pre-pubescent boy's penis..

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 87

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00339, and depicting a close-up image of a pre-pubescent boy's penis protruding through his underwear.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 88

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00240, and depicting a close-up image of a pre-pubescent boy grasping at his penis and pushing down his underwear.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 89

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00344, and depicting an image of a pre-pubescent boy grasping at his penis and pushing down his underwear.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 90

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00355, and depicting an image of a nude pre-pubescent boy's standing torso.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 91

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been

mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00356 and 00357, and depicting an image of a nude pre-pubescent boy's abdominal and genital area. His legs are spread, exposing his penis. His arms appear to be tied behind his back and the defendant's finger is in the image.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 92

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00358, and depicting an image of a nude pre-pubescent boy lying on a bed with his legs out in a "v" in the air, exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 93

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00359, and depicting an image of a nude pre-pubescent boy's body sitting cross-legged on a bed. His penis is exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 94

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00360 and 00361, and depicting an image of a nude pre-pubescent boy's torso.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 95

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00367, and depicting an image of a partially nude pre-pubescent boy lying on a bed with his arms behind his head and penis exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 96

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual

depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00369, and depicting a very close-up image of a pre-pubescent boy's anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 97

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00370, 00371, and 00372, and depicting a very close-up image of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 98

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00407 and 00408, and depicting an image a pre-pubescent boy lying on his back with his feet up by his ears. His genitals and anus are exposed.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 99

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00421 and 00423, and depicting an image of a pre-pubescent boy lying face down on a bed. His is only wearing a shirt with his anus being further exposed by his hands.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 100

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00439, and depicting an image of a pre-pubescent boy lying on his back with his legs spread and his hands resting near his erect penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 101

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual

depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00472, and depicting an image of a pre-pubescent boy standing partially nude. He is wearing a shirt and his underwear is pulled down around his ankles.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 102

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00482, and depicting an image of a pre-pubescent boy's penis being fondled by the defendant.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 103

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00490, 00522, and 00594, among others and depicting images of close up's of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 104

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00579, and depicting an image of a pre-pubescent boy standing while holding his shirt up with one hand and his penis in the other hand.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 105

On or about September 17, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00601 and 00619, among others, and depicting images of a partially nude pre-pubescent boy lying on his back with his legs spread exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 106

On or about September 17, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual

depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00641 and 00768, and depicting images of a pre-pubescent boy lying on his back with his hands behind his head exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 107

On or about September 17, 2002, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00666 and 00681, and depicting images of a partially nude pre-pubescent boy bending over on a bed with his shorts pulled around his knees and exposing his anus.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 108

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00695 and 00706, and depicting images of a pre-pubescent boy's penis with his hand wrapped around his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 109

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00714, and depicting a pre-pubescent boy lying on a bed with his legs up over his head and exposing his anus and genital area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 110

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00719, and depicting a partially nude pre-pubescent boy lying on a bed with his knees spread and fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 111

On or about February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 01036 and 01065, and depicting a partially nude pre-pubescent boy standing with one hand holding up his shirt and the other fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 112

On or about January 13, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00924, and depicting a partially nude pre-pubescent boy reclining in a chair fondling his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 113

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00939 and 00954, and depicting close up images of pre-pubescent boy's penis, the boys underwear is pulled back exposing his penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 114

On or about January 27, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, photos partially identified as 00982 and 00993, and depicting close up images of a pre-pubescent boy's penis.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 115

On or before February 24, 2003, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in interstate commerce or was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce: to wit, a photo partially identified as 00840, and depicting a nude pre-pubescent boy lying on his back with his legs pulled up by his ears, holding his buttocks, further exposing his anus and genital area.

In violation of 18 U.S.C. §§ 2251(a) and 2251(e).

Count 116

By and between December 26, 2008 and July 1, 2010, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did knowingly transport and ship in interstate commerce by any means, including by a computer, any visual depiction, the production of which involved the use of

a minor engaging in sexually explicit conduct and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§2252(a)(1) and 2252(b)(1).

Count 117

By and between December 26, 2008 and July 1, 2010, in the Southern District of Ohio, the defendant, ANDREW F. KEITH, did knowingly possess one or more matters, which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§2252(a)(4) and 2252(b)(2).

Forfeiture

Upon conviction of an offense alleged in Counts 1 through 117 of this Indictment, the defendant shall forfeit to the United States the defendant's interest in:

1. All visual depictions, in any form, described in Title 18, United States Code, Sections 2251, 2251A or 2252, and any book, magazine, periodical, film, video tape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, Chapter 110;
2. All property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and;
3. All property, real or personal, used or intended to be used to commit or to promote

the commission of such offense

All pursuant to 18 U.S.C. §2253(a)(1) and (3).

A TRUE BILL.

S/
GRAND JURY FOREPERSON

CARTER M. STEWART
UNITED STATES ATTORNEY



ANTHONY SPRINGER
CINCINNATI BRANCH CHIEF